#### BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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**POSTAL RATE AND FEE CHANGES, 2000** 

**DOCKET NO. R2000-1** 

# ERRATA TO INITIAL BRIEF FILED ON BEHALF OF E-STAMP CORPORATION

The attached errata provide corrections to the Table of Contents and to page 10 of the Initial Brief for E-Stamp Corporation. A list of the corrections is attached, along with a copy of the relevant page with the highlighted corrections.

Respectfully submitted,

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

Timothy J. May

Dated: September 14, 2000

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witnesses stated E-Stamp failed to correctly measure the cost avoidance of PC postage; that the surveys presented by E-Stamp and Stamps.com were too flawed to be reliable for measurements of the expected usage and customer behavior; and that implementation of a discount would be a complicated and lengthy process.

It was not to be expected that the Postal Service would endorse a rate proposal that it itself had not advanced (in almost thirty years it never has); but the vehemence of its opposition to a discount for a product that it itself launched, and initially encouraged vendors to embrace, is not only disappointing but more than a little puzzling.

Nevertheless, as the following arguments will demonstrate, the basis for the Postal Service's opposition is largely groundless and is a series of gross exaggerations: exaggerations about the permanence of the way mail is processed; the degree of imprecision about the cost avoidance estimates; the seriousness of the survey flaws; and the difficulties of implementation.

A. USPS Witness Miller Has Failed To Rebut The Obvious Fact That PC Postage Products, As Compared To Both Handwritten Letters And Bulk Metered Mail Letters, Do Provide Savings To The Postal Service.

Readily rebutting witness Miller's contention that PC postage provides little or no savings was the Postal Service's own official document: Postal Bulletin PB 22004, dated August 12, 1999. That Postal Bulletin issue contains the following comments about PC postage mail: "PC postage products provide time savings, increased efficiency, reduced costs, and enhance security for both customers and the Postal Service." (Page 9) When asked to reconcile his testimony with the Postal Bulletin assertion of cost savings, the witness was unable to do that. Tr. 45/19714-17.